



July 31, 2000

Jamie Rappaport Clark, Director  
U.S. Fish & Wildlife Service  
1849 C. Street, Rm. 3012  
Washington, D.C. 20240

Dear Director Clark:

I am writing in response to the "Injurious Wildlife: Review of Information Concerning Black Carp", published in the Federal Register on 2 June 2000 for listing the black carp under the federal Lacey Act. But first, I want to express my appreciation to you for responding positively to MICRA's February 24 letter requesting such action, and for quickly taking the initiative to begin the process.

The concerns expressed in our February 24 letter (copy attached) remain the same, so I won't go into detail repeating them here. Our Executive Board, in April, recommended the use of triploid (sterile) black carp until a suitable alternative can be found. But all but one of our 28 member states feel that this species poses a significant enough threat to the nation's mussel resources that more drastic action (i.e. complete elimination) is merited. Suffice it to say that MICRA wishes the black carp to be completely banned from the United States, and that all existing stocks be acquired and destroyed. Only Arkansas has expressed an opposing view on this matter. Arkansas currently allows the possession of diploid black carp on permitted aquaculture facilities and is considering restricting general aquaculture use to triploids only. Since one of the Basin states holds such an opposing view, and will continue to allow use of the species in their waters even if the black carp is listed under the Lacey Act, all of the other basin states have a major problem on their hands. Political boundaries mean nothing to biological organisms, so once this species finds it's way into the wild, and it will, just as at least three other Asian carps have, it will also find it's way into waters of the other states, to the far corners of the basin, and ultimately into the waters of the entire nation. This will spell disaster to our nation's freshwater mussel species.

The only way to prevent this is to stop the black carp in it's tracks while it is still in captivity. And the only way to do that is to place the species under federal control, because even if it were banned in all but one of the continental United States, none of these states could do anything about the one remaining state where it's use would continue to be allowed. So this is truly a federal matter, and it deserves swift and decisive federal action beyond what is currently authorized under the Lacey Act. If such action includes purchase of all existing black carp stocks, MICRA supports that. If such action includes some form of emergency Presidential or Congressional order to acquire and destroy all existing black carp stocks, MICRA supports that. If such action includes new legislation and expanded authority of the federal government over such matters, many MICRA member states are ready to support that – others may with additional consideration and limitation of such authority, on a case by case basis to specific injurious species such as the black carp. In other words, MICRA and it's members states support almost any action necessary to eliminate this species from the map of the United States!

We simply cannot allow such damaging and rogue species as the black carp to escape to the wild. Since even listing this species under the Lacey Act as an Injurious Species of Wildlife will not

prevent its use in states where permitted, I urge you to elevate this matter to Presidential and Congressional levels where emergency measures beyond the Lacey Act can and should be taken. MICRA will support you in taking such action.

I look forward to working with you further on this matter, and thank you for this opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "William C. Reeves". The signature is written in a cursive, slightly slanted style.

William C. Reeves, Chairman

Enclosure

cc.: ANS Task Force  
Secretary of the Interior  
Mississippi River Basin Congressional Delegation  
MICRA Members  
State Basin Associations  
Regional Directors, USFWS Regions 2,3,4,5,6  
USFWS Division of Management Assistance  
USFWS Invasive Species Coordinator  
Catfish Farmers of America  
American Fisheries Society  
American Sport Fishing Association  
Freshwater Mussel Conservation Society